

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LINDA D. CRAWFORD,

Plaintiff,

08 Civ 6293 (JFK)(FM)

- against -

NOTICE OF MOTION

FRANKLIN CREDIT MANAGEMENT CORPORATION,
TRIBECA LENDING CORPORATION,
LENDERS FIRST CHOICE AGENCY, INC,
Defendants.

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PLEASE TAKE NOTICE THAT, upon the enclosed Affirmation of Krishnan Chittur, Esq., dated April 3, 2009; the Memorandum of Law; and upon all prior proceeding herein, Plaintiff will move this Court at 500 Pearl Street, New York, New York, before Hon. Frank Maas, Magistrate Judge, on such date and time as may be convenient to the Court for an Order under Rule 37, Fed. R. Civ. P.:

1. Precluding defendants from presenting any evidence at trial, and/or striking defendants Answer on grounds of sustained discovery misconduct; and
2. Requiring Defendants to pay Ms. Crawford's attorneys' fees and expenses under Rule 37(b)(2)(C); and
3. Granting such other relief as may be appropriate.

Dated: New York, New York
April 3, 2009

Chittur & Associates, P.C.

/s/

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